

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
IN RE:	)	Chapter 11
BRADLYNN CORP INC.	)	Case No.: 23-12142
Debtor,	)	
_____	)	

**APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT OF COUNSEL  
FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

Bradlynn Corp. Inc., Debtor and Debtor-in-Possession (the “Debtor”), submits this application (the “Application”) pursuant to section 327(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Federal Rule of Bankruptcy Procedure (the “Bankruptcy Rules”) 2014(a) for an order authorizing the Debtor to employ and retain the firm of The Law Office of Peter M. Daigle (“Firm”) as attorneys in this chapter 11 case. In support of this Application, the Debtor respectfully represents to this Honorable Court as follows:

On December 21, 2023, this case was commenced by the filing of a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Massachusetts (the “Bankruptcy Court”).

The Debtor intends to continue in the possession of his property as Debtor-in-Possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

The Debtor is a Massachusetts Corporation with an address in Lakeville, Massachusetts.

The Debtor desires to retain and employ The Law Office of Peter M. Daigle pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) to perform all legal services in these proceedings as more fully set forth below.

In order to enable the Debtor to perform his duties as Debtor-in-Possession and to effect the proper and expeditious administration of this case, The Law Office of Peter M. Daigle will be required to render legal services to the Debtor in connection with this proceeding, including, but not limited to, the following:

- a) Assisting and advising the Debtor relative to the administration of this proceeding;
- b) Representing the Debtor before the Bankruptcy Court and advising the Debtor on all pending litigations, hearings, motions, and of the decisions of the Bankruptcy Court;
- c) Reviewing and analyzing all applications, orders, and motions filed with the Bankruptcy Court by third parties in this proceeding and advising the Debtor thereon;

- d) Attending all meetings conducted pursuant to section 341(a) of the Bankruptcy Code and representing the Debtor at all examinations;
- e) Communicating with creditors and all other parties in interest;
- f) Assisting the Debtor in preparing all necessary applications, motions, orders, supporting positions taken by the Debtor, and preparing witnesses and reviewing documents in this regard;
- g) Conferring with all other professionals, including any accountants and consultants retained by the Debtor and by any other party in interest;
- h) Assisting the Debtor in its negotiations with creditors or third parties concerning the terms of any proposed plan of reorganization;
- i) Preparing, drafting and prosecuting the plan of reorganization and disclosure statement; and
- j) Assisting the Debtor in performing such other services as may be in the interest of the Debtor and the Estate and performing all other legal services required by the Debtor.

The Debtor believes that The Law Office of Peter M. Daigle is well-qualified to be counsel to the Debtor, having ample experience in bankruptcy and insolvency matters. The Law Office of Peter M. Daigle's attorneys have had considerable experience in matters of this nature and are capable of rendering the services required.

As set forth in the Affidavit of Attorney Peter M. Daigle, (the "Affidavit"), attached and incorporated herein as Exhibit #1, The Law Office of Peter M. Daigle represents no interest adverse to the estate regarding the matters upon which it is to be engaged, and is "disinterested" as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b). The Law Office of Peter M. Daigle will not, while retained by the Debtor, represent any other party in interest in connection with this case.

The members and associates of The Law Office of Peter M. Daigle do not have any connection with the Debtor (other than as Debtor's attorneys), the Debtor's affiliates, partners, creditors, stockholders, any other party in interest, the United States trustee, or any person employed in the office of the United States trustee.

The employment of The Law Office of Peter M. Daigle is in the best interests of the Debtor, the creditors and the estate.

The Law Office of Peter M. Daigle will charge fees and expenses incurred in representing the Debtor in these proceedings based on the normal rates charged by the attorneys and paralegals of The Law Office of Peter M. Daigle for similar clients, currently \$450.00 hr. for Senior Attorneys

and \$325.00 hr. for Associate Attorneys. Such rates are subject to periodic review and change, usually on an annual basis. The Law Office of Peter M. Daigle will seek compensation for services rendered and expenses incurred upon appropriate application to the court pursuant to sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rules.

**WHEREFORE**, the Debtor requests authorization to retain and employ the law firm of The Law Office of Peter M. Daigle as counsel to assist in the performance of his functions and otherwise with respect to this case pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a), and for such other relief as the Court deems just and proper.

Respectfully submitted,  
The Debtor,  
By Its Attorney,

/s/ Peter M. Daigle  
Peter M. Daigle, Esquire  
BBO # 640517  
1550 Falmouth Road, Suite 10  
Centerville, MA 02632  
(508) 771-7444

Dated: December 22, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a duplicate copy of the above to be served upon all parties of record by electronic e-mail and first class mail.

/s/ Peter M. Daigle  
Peter M. Daigle, Esquire

Dated: December 22, 2023

**Email/ECF:**

Richard King, Office of the US Trustee

**First Class Mail:**

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**Air Energy**

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**Dean Fawcett III**

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**Dean Fawcett, III**

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**First Citizens Federal Credit Union**

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**Florida Department of Financial  
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as receiver for United Property & Casult  
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**Massachusetts Department of Revenue**

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